

REMARKS

This amendment responds to the July 3, 2006 Office Action. With this Amendment, Applicants have amended claim 14 to recite “wherein each split in said hierarchy of splits is spatially encompassed within a display defined by said parent split.” Furthermore, claim 14 now recites “a type field that specifies whether the respective split is a data split and, when the respective split is not a data split, defines an orientation of the respective split spatially within the parent split of the respective split.” Claim 14 has been further amended to recite a display module that displays a translation of the hierarchy of splits. Furthermore, new claims 21-23 have been added.

Claim 14 states that a layout comprises a hierarchy of splits. Thus, page 7, lines 28-34, of the specification supports the above-identified amendments by stating that “[e]ach layout comprises a series of instructions that are hereinafter referred to as splits to emphasize that they do not encode absolute screen positions, but rather specify subdivisions in the layout.” Further, page 10, lines 8-10, of the specification states that “Layoutdata table 84 also includes several property columns that determine attributes of the split such as position relative to the other daughter splits sharing a parent, height, width, and alignment.” And further, that “no column of a split in the layoutdata table 84 dictates the absolute position of a split in a given display.” Such absolute positions are not specified because splits are spatially within the parent split. Support for recitation of a display module that displays a translation of the hierarchy of splits in claim 14, as well as new claims 21-23, is found, for example, on page 16, line 26, through page 17, line 32, of the specification and steps 314 and 316 of Figure 3A.

With this amendment, Applicants have also amended claims 18-20 for clarity by replacing the word “database” with the phrase “computer system.” Upon entry of the present amendments, claims 14-20 will remain pending in the above-identified application. No new matter has been added by way of the amendments to the claims or the new claims. Entry of the foregoing amendments to the claims is respectfully requested.

In the July 3, 2006 Office Action, the Examiner:

- rejected claims 18-20 under 35 U.S.C. § 112, second paragraph, as being indefinite;

- rejected claims 18-20 under 35 U.S.C. § 112, second paragraph, as being incomplete;
- rejected claims 14, and 16-19 under 35 U.S.C. § 102(b) as being anticipated by United States Patent Publication Number 2002/0120596 to Gershoff *et al.* (hereinafter “Gershoff”);
- rejected claim 15 under 35 U.S.C. § 103 as being unpatentable over Gershoff in view of United States Patent Publication Number 2003/0137539 to Dees (hereinafter “Dees”); and
- rejected claim 20 under 35 U.S.C. § 103 as being unpatentable over Gershoff in view of United States Patent Number 5,050,074 to Marca (hereinafter “Marca”).

STATEMENT OF THE SUBSTANCE OF THE INTERVIEW

Pursuant to M.P.E.P. § 713.04, Applicants submit the following statement of the substance of a telephonic interview held on Wednesday August 30, 2006 between Examiner Nathan Hillary and attorney for Applicants, Brett Lovejoy, in connection with the above-identified application. For the purposes of discussion, Applicants faxed to the Examiner a draft paper outlining a response to each of the rejections raised in the July 3, 2006 office action. The draft paper is substantially the same as set forth in the instant paper with the exception that claim amendments discussed with the Examiner during the interview have been implemented.

As a preliminary matter, the attorney for Applicants proposed to amend claims 18-20 to remove references to a “database” in order to address the 35 U.S.C. § 112, second paragraph, rejections. The Examiner indicated that the proposed changes would probably address the 35 U.S.C. § 112, second paragraph, rejections to claims 18-20.

Next, the attorney for Applicants and the Examiner discussed the 35 U.S.C. § 102 rejection of claims 14, and 16-19 in view of Gershoff. Attorney for Applicants noted that Gershoff does not disclose a hierarchy of splits, where each split in the hierarchy of splits is spatially encompassed within a display defined by the parent split. The Examiner stated that because of the way claim 14 was written in the draft paper, this feature was not sufficiently positively recited. Thus, the Examiner and the

attorney for Applicants discussed claim amendments that would make the proposed claim limitation positively recited so that it could be used as a basis for distinguishing over Gershoff. The Examiner and attorney for Applicants discussed a claim limitation directed to a layout display module that *displays* the hierarchy of splits as one way of positively reciting the feature. Accordingly, with this response, as discussed below, Applicants have amended claim 14 to recite a display module that displays a translation of the hierarchy of splits.

**THE REJECTION OF CLAIMS 18-20 UNDER 35 U.S.C. § 112, SECOND
PARAGRAPH, SHOULD BE WITHDRAWN**

The Examiner has rejected claims 18-20 under 35 U.S.C. § 112, second paragraph, as being indefinite. Specifically, the Examiner has rejected claims 18-20 for reciting a database without sufficient antecedent basis. Further, the Examiner has rejected claims 18-20 for failing to establish a nexus between the claimed system and tables and the claimed database. Applicants would like to thank the Examiner for identifying these deficiencies in claims 18-20. Applicants have amended claims 18 and 19 to replace the word “database” with the phrase “computer system.” Applicants have deleted the word “database” from claim 20. Accordingly, Applicants request that the 35 U.S.C. § 112, second paragraph, rejection of claims 18-20 be withdrawn.

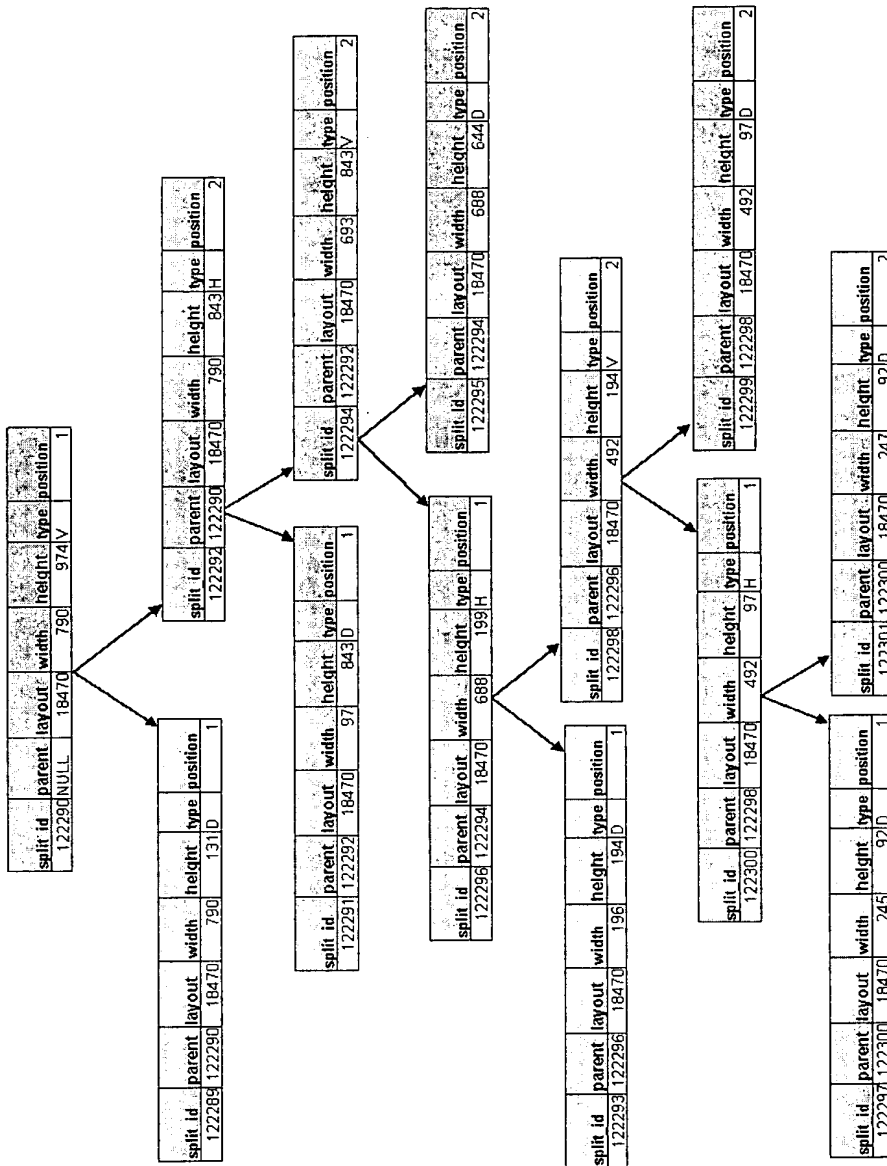
**THE 35 U.S.C. § 102 REJECTION OF CLAIMS 14 AND 16-19 SHOULD BE
WITHDRAWN**

The Examiner has rejected claims 14 and 16-19 under 35 U.S.C. § 102(b) as being anticipated by Gershoff. Applicants traverse the rejection on the basis that Gershoff does not disclose the arrangement of daughter splits **spatially** within parent splits. Furthermore, Gershoff does not disclose a display module that displays a translation of such splits.

Claim 14, as amended, orders information in a spatial manner. For instance, claim 14 recites “wherein each split in said hierarchy of splits is **spatially** encompassed within a display defined by said parent split.” Further, Applicants’ claim 14 recites a type field that specifies whether the respective split is a data split

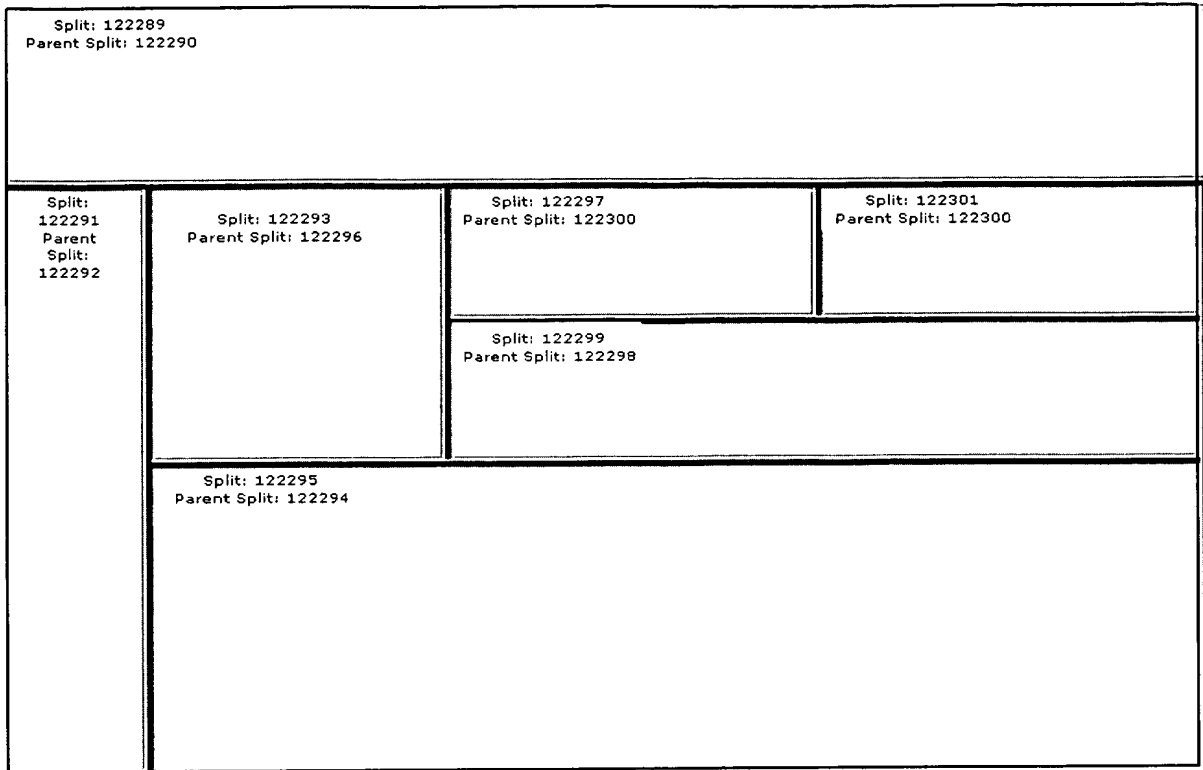
and, when the respective split is not a data split, defines an orientation of the respective split **spatially** within the parent split of the respective split. In accordance with page 10, lines 9-10, of Applicants' specification, no column in layoutdata table 84 dictates the absolute position of a split in a given display because such positions are spatially within a parent split and are relative to other daughter splits within the parent split. In contrast, Gershoffs' view Zones table (Figure 7), does provide hard coded x,y positions for data objects.

Applicants' layoutdata table is a branching hierarchy that divides a canvas (the top split) into a series of spatial subdivisions called splits. A split is a container in a visual presentation that possesses orientation properties (horizontal and vertical) and inheritance properties (parent split). Such properties allow a complex visual presentation to be broken down into a hierarchical relationship and stored in a database in accordance with the claimed invention. Below is an exemplary layoutdata table in accordance with the present invention. The branching hierarchy of this table is evident. All splits with a type of D are leafs in the hierarchy.



This branching hierarchy allows for the transformation of a visual presentation of information into data so that it can be stored in a language free format. Each branch in the hierarchy changes the orientation of how items will be arranged on the page so that items can be placed on a page in a complex non-linear manner.

The figure below is the visual manifestation of the layoutdata data presented above. Only type D splits are visible in the figure. H or V type splits are parent splits that make up the underlying structure of the presentation through branching hierarchical relationships, spatial dimensions, and orientation parameters that allow the presentation to branch and not appear in a linear manner.



As can be seen in the illustration above, each split in the hierarchy of splits is **spatially** encompassed within a display defined by the parent split. Gershoff does not disclose such a feature. Indeed, such a feature would run contrary to the objectives of Gershoff. The abstract of Gershoff states that the invention provides a method of managing a plurality of related publications. Paragraph 14 of Gershoff states that “what is needed in the art is an improved system to maintain manuals for similar products that may have only small differences from one another.” Such a system cannot possibly be equated to Applicants’ a hierarchy of splits in which each split in the hierarchy of splits is **spatially** encompassed within a display defined by the parent split.

Examining details of Gershoff provides even more differences between the claimed invention and Gershoff. For example, in Gershoff’s manual table, the root procedure ID is a table of contents in which all of the other procedures are contained. Each procedure gets arranged one after the other in a linear fashion. In Applicants’ claimed layout table, the top split represents the boundaries of a visual presentation. That is, the height and width columns for the top split determine the outer dimensions of the presentation.

Gershoff teaches the notion of nested procedures in a sequential manner. For example, in Gershoff, the root procedure is the table of contents, its children are Chapter 1, Chapter 2, Chapter 3 *etc...* Nested in each of these children are grandchild procedures. “Chapter 1” for instance could contain procedures such as “Plugging in Your Washer,” “Understanding the Washer Controls,” *etc...* This is a sequential ordering of information designed to organize information in the manner expected in a help manual. Gershoff’s nested procedures facilitate reuse of such procedures across manuals for similar products. If, for instance, the “Washamatic 2000” and “Washamatic 2001” share the same installation instructions, then the procedure holding those installation instructions can be inserted into both manuals as a child procedure. Gershoff’s content table simply nests one procedure inside another. While this creates a parent child relationship, that relationship does not have **spatial** dimensions. That is, Gershoff does not teach that one procedure is **spatially** encompassed by another procedure. Furthermore, the type field on Gershoff’s content table is a lookup value used to indicate which table the ID_Content value should be joined to, and does not contain any spatial properties.

Claims 16-19 ultimately depend from claim 14 and are patentable over Gershoff for the same reasons that claim 14 is patentable over Gershoff. For the above-identified reasons, Applicants request that the 35 U.S.C. § 102(b) rejection of claims 14 and 16-19 be withdrawn.

THE 35 U.S.C. § 103 REJECTION OF CLAIM 15 SHOULD BE WITHDRAWN

The Examiner has rejected claim 15 under 35 U.S.C. § 103(a) as being unpatentable over Gershoff in view of Dees. Applicants traverse the rejection. In the claimed invention, splits are **spatially** encompassed within a display defined by a parent split. Gershoff does not teach this feature. As discussed above, Gershoff uses hierarchical nesting to place child procedures inside parent procedures. Dees, which is directed to a method of styling a user interface and a device with adaptive user interface, does not remedy the deficiencies in Gershoff. Accordingly, Applicants request that the 35 U.S.C. § 103 rejection of claim 15 be withdrawn.

THE 35 U.S.C. § 103 REJECTION OF CLAIM 20 SHOULD BE WITHDRAWN

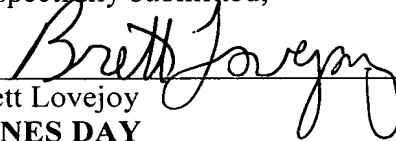
The Examiner has rejected claim 20 under 35 U.S.C. § 103(a) as being unpatentable over Gershoff in view of Marca. Applicants traverse the rejection. In the claimed invention, splits are **spatially** encompassed within a display defined by a parent split. Gershoff does not teach this feature. Marca, which is directed to a system for facilitating coordination of activities by a plurality of actors with an object database, does not remedy the deficiencies in Gershoff. Accordingly, Applicants request that the 35 U.S.C. § 103 rejection of claim 20 be withdrawn.

CONCLUSION

Applicants respectfully request that the above-mentioned remarks be made of record in the instant application. If any issues remain in connection herewith, the Examiner is respectfully invited to telephone the undersigned to discuss the same.

Date: September 8, 2006

Respectfully submitted,


Brett Lovejoy 42,813
JONES DAY (Reg. No.)
222 East 41st Street
New York, New York 10017-6702
(415) 875-5744